

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NATALIE TURNER and
PATRICE BROOKS-RICHARDSON,

Plaintiffs,

v.

C.A. NO.: 3:13-cv-03277

ALLEGIS GROUP HOLDINGS, INC.

Defendant.

COMPLAINT AND DEMAND FOR JURY TRIAL

COME NOW the Plaintiffs, NATALIE TURNER and PATRICE BROOKS-RICHARDSON, by and through their undersigned counsel, and sue the Defendant, ALLEGIS GROUP HOLDINGS, INC., and in support thereof state as follows:

1. Plaintiffs bring this action for overtime compensation and other relief under the Fair Labor Standards Act, as amended, 29 U.S.C. §216(b).
2. Plaintiff NATALIE TURNER is an individual residing in the State of Texas.
3. Plaintiff PATRICE BROOKS-RICHARDSON, is an individual residing in the State of Texas.
4. Defendant, ALLEGIS GROUP HOLDINGS, INC., is a corporation formed and existing under the laws of the State of Maryland and which maintains and operates an office in the State of Texas.
5. Jurisdiction is conferred on this Court by Title 28 U.S.C. §1337 and by Title 29 U.S.C. §216(b). At all times pertinent to this complaint, ALLEGIS GROUP HOLDINGS, INC. was an enterprise engaged in interstate commerce. At all times pertinent to this

Complaint, Defendant regularly owned and operated businesses engaged in commerce or in the production of goods for commerce as defined by §3(r) and 3(s) of the Act, 29 U.S.C. §203(r) and 203(s). Additionally, Plaintiffs were individually engaged in commerce and their work was essential to Defendant's business.

6. Venue is proper in this district under 28 U.S.C. § 1391.

7. Plaintiff NATALIE TURNER was employed by Defendant from July 2011 through June 2012 as a recruiter.

8. Plaintiff PATRICE BROOKS-RICHARDSON, was employed by Defendant from July 2011 through January 2012 as a recruiter.

9. During one or more weeks of Plaintiffs' employment with Defendant, Plaintiffs have worked in excess of forty (40) hours (overtime hours).

10. During one or more weeks of Plaintiffs' employment with Defendant wherein Plaintiffs worked overtime hours, Defendant has failed to pay Plaintiffs one and one-half times their regular rate of pay for each overtime hour worked.

(COUNT I – NATALIE TURNER)

11. Plaintiff, NATALIE TURNER, realleges and incorporates herein the allegations contained in Paragraphs 1, 2, 4 through 7 and 9 through 10 above.

12. The acts described in the preceding paragraph violate the Fair Labor Standards Act, which prohibits the denial of overtime compensation for hours worked in excess of forty (40) per workweek. Defendant willfully violated Plaintiff's rights under the FLSA.

13. As a result of Defendant's unlawful conduct, Plaintiff NATALIE TURNER is entitled to actual and compensatory damages, including the amount of overtime which was not paid and which should have been paid.

14. Section 216(b) of the FLSA provides that any employer who violates the statute shall be liable for unpaid overtime pay and an additional equal amount as liquidated damages. Therefore, Plaintiff NATALIE TURNER seeks an award of liquidated damages in an equal amount as the amount of unpaid overtime pay.

15. Plaintiff NATALIE TURNER also seeks compensation of the out of pocket expenses and costs of court she will have incurred in this action. Plaintiff is also entitled to reasonable and necessary attorneys fees pursuant to 29 U.S.C. § 216(b).

WHEREFORE, PREMISES CONSIDERED, Plaintiff NATALIE TURNER requests that:

1. The Court assume jurisdiction of this cause and that Defendant be cited to appear;
2. The Court award damages to Plaintiff as specified above;
3. The Court award reasonable and necessary attorneys and expert fees and costs;
4. The Court award Plaintiff pre-and post-judgment interest at the highest rates allowed.

Plaintiff further prays for any such other relief as the Court may find proper, whether at law or in equity.

(COUNT II – PATRICE BROOKS-RICHARDSON,)

16. Plaintiff, PATRICE BROOKS-RICHARDSON, realleges and incorporates herein the allegations contained in Paragraphs 1, 3, 4 through 6 and 8 through 10 above.

17. The acts described in the preceding paragraph violate the Fair Labor Standards Act, which prohibits the denial of overtime compensation for hours worked in excess of forty (40) per workweek. Defendant willfully violated Plaintiff's rights under the FLSA.

18. As a result of Defendant's unlawful conduct, Plaintiff PATRICE BROOKS-RICHARDSON, is entitled to actual and compensatory damages, including the amount of overtime which was not paid and which should have been paid.

19. Section 216(b) of the FLSA provides that any employer who violates the statute shall be liable for unpaid overtime pay and an additional equal amount as liquidated damages. Therefore, Plaintiff PATRICE BROOKS-RICHARDSON, seeks an award of liquidated damages in an equal amount as the amount of unpaid overtime pay.

20. Plaintiff PATRICE BROOKS-RICHARDSON, also seeks compensation of the out of pocket expenses and costs of court she will have incurred in this action. Plaintiff is also entitled to reasonable and necessary attorneys fees pursuant to 29 U.S.C. § 216(b).

WHEREFORE, PREMISES CONSIDERED, Plaintiff PATRICE BROOKS-RICHARDSON, requests that:

1. The Court assume jurisdiction of this cause and that Defendant be cited to appear;
2. The Court award damages to Plaintiff as specified above;
3. The Court award reasonable and necessary attorney and expert fees and costs;
4. The Court award Plaintiff pre-and post-judgment interest at the highest rates allowed.

Plaintiff further prays for any such other relief as the Court may find proper, whether at law or in equity.

JURY TRIAL DEMAND

Plaintiffs demand a jury trial on all issues so triable.

Respectfully submitted this 20th day of August, 2013.

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